

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. ) No. 23-cr-10186-ADB  
 )  
 JAQUORI LYONS, et al. )

MEMORANDUM PURSUANT TO LOCAL RULE 116.5(b) AND MOTION FOR  
EXCLUSION OF TIME UNDER THE SPEEDY TRIAL ACT THROUGH NEXT STATUS  
CONFERENCE

The United States' Attorney, based on communications with counsel for the defendants<sup>1</sup>, hereby submits this status memorandum addressing the issues set forth in Local Rule 116.5(b)(1) through (b)(10).

The parties request that another Interim Status Conference be set in 45 days to allow the parties to continue in the discovery process and to prepare for trial. The parties further move that time be excluded under the Speedy Trial Act to the next date set by the Court as the additional time is necessary to review discovery and to prepare for trial.

As of the present date, two defendants (Defendant Cirino and Defendant Roberson) have pled guilty. The government is in plea discussions with other defendants.

<sup>1</sup> The government has not been able to meet and confer with counsel for defendant Avalo.

The government has met with new counsel for Zion Ford to review discovery to aid in the defendant's review and preparation for trial. The government is planning to meet with counsels for Defendant Lyons and Defendant Finch to review discovery to aid in the defendants' review and preparation for trial. The government anticipates this occurring in the next 30 days.

As noted previously, the government has been in contact with a Court representative (Mr. Andrews) regarding the need for laptop computers or other electronic materials to facilitate discovery for defendants in custody. The government understands certain counsel have contacted Mr. Andrews about issues and that Mr. Andrews will be working with defendants on any outstanding issues. The government is prepared to facilitate any steps needed.

Speedy Trial Act

Time has been excluded under the Speedy Trial Act through May 22, 2025. The parties further move for the exclusion of time under the Speedy Trial Act to the next scheduled Status Conference in the interests of justice given the ongoing discovery process as such time is necessary for the parties to review the extensive discovery, resolve outstanding discovery issues, and prepare for trial. Based upon the nature of the

racketeering case, the parties have requested that the case be designated as complex pursuant to 18 U.S.C. §3161(h) (7) (B) (ii) .

(b) (1) and (2)

As noted previously, and as discussed at the last Status Conference, the discovery produced to date has been extensive. The defendants are in the process of reviewing the discovery productions and may make additional discovery requests based upon their review.

(b) (3)

The government expects automatic discovery has been completed. Additional discovery may also be necessary based upon requests by the defendants. The government will also supplement automatic discovery with any discovery received from local investigations that are relevant to the RICO conspiracy.

(b) (4)

The parties have finalized a protective order to be used in the production of phone data from seized cellular phones. Additional protective orders will likely be necessary for additional sensitive materials, including materials related to potential cooperators and/or trial witnesses.

(b) (5)

The parties request that motion dates be set at a later Status Conference.

(b) (6)

The parties request that the timing of expert reports be set at a later date due to the complexity of this case and the need to meet and confer as to an appropriate disclosure schedule prior to any trial.

(b) (7)

No defense of insanity, public authority or alibi are expected at this time.

(b) (8)

Time has been excluded through May 22, 2025. The parties further agree, in light of ongoing discovery and the review of discovery by the defendants, that time be excluded until the next Interim Status Conference under the Speedy Trial Act as such time is necessary to properly prepare for trial. As the Court is aware, the parties have requested in the past that the case be declared complex for the purposes of the Speedy Trial Act given the complex nature of the RICO conspiracy charge and the significant amount of discovery associated with the RICO conspiracy charge.

(b) (9)

The government is engaged in substantive plea discussions with multiple defendants. Two defendants have pled guilty. The

parties further request that estimated length of a potential trial be provided at a later date to allow the defendants to review discovery regarding the primary RICO conspiracy charge. As noted above, such discovery is extensive. The government may add additional charges, but such charges would not necessitate significant additional discovery.

(b) (10)

The parties request an interim status conference in 45 days to allow discovery to continue and the defendants to review the discovery and prepare for trial.

Respectfully submitted,

LEAH B. FOLEY  
United States Attorney

/s/ Michael Crowley  
MICHAEL CROWLEY  
SARAH HOEFLER  
DAVID CUTSHALL  
Assistant U.S. Attorneys

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on the below date.

/s/ Michael Crowley  
May 20, 2025 Michael Crowley

Assistant U.S. Attorney